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14 [Additional counsel appear on signature page.]

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

17 In re OPENWAVE SYSTEMS, INC.
SHAREHOLDER DERIVATIVE
18 LITIGATION

) Master File No. C-06-03468-SI

) STIPULATION AND [PROPOSED] ORDER
) TO EXTEND TIME AND ESTABLISH
19 BRIEFING SCHEDULE

20 This Document Relates To:

21 ALL ACTIONS.

WHEREAS, on December 29, 2006 plaintiffs filed a Consolidated Verified Shareholders Derivative Complaint;

WHEREAS, on May 17, 2007 this Court entered an Order dismissing plaintiffs' Consolidated Verified Shareholders Derivative Complaint;

WHEREAS, this Court's May 17, 2007 Order allowed plaintiffs to file an amended complaint by June 22, 2007;

WHEREAS, the amendment to plaintiffs' complaint involves numerous analytical and legal issues;

WHEREAS, on June 21, 2007 plaintiffs' counsel sought defendants' counsel's agreement to extend the date by which plaintiffs must file any amendment to the complaint by one week; and

WHEREAS, defendants' counsel indicated they do not object to such an extension of time and the parties agreed to a briefing schedule for defendants' responsive motions.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the parties, through their respective counsel of record, as follows:

1. Plaintiffs may file any amended complaint by June 29, 2007;
2. Defendants may file motions to dismiss or other responsive briefing by July 31, 2007;
3. Plaintiffs may file oppositions to defendants' motions to dismiss by August 31, 2007;
4. Defendants may file any reply briefs by September 21, 2007.

IT IS SO STIPULATED.

DATED: June 21, 2007

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s/ Benny C. Goodman III
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18 *I, Benny C. Goodman III, am the ECF User whose ID and password are being used to file*
19 *this Stipulation and [Proposed] Order to Extend Time and Establish Briefing Schedule. In*
20 *compliance with General Order 45, X.B., I hereby attest that Garrett J. Waltzer has concurred in*
21 *this filing.*

22 DATED: June 21, 2007

23 SKADDEN, ARPS, SLATE, MEAGHER
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M. Puckett, Andrew W. Verhalen and Alain
Rossmann

1 *I, Benny C. Goodman III, am the ECF User whose ID and password are being used to file*
2 *this Stipulation and [Proposed] Order to Extend Time and Establish Briefing Schedule. In*
3 *compliance with General Order 45, X.B., I hereby attest that Paul J. Collins has concurred in this*
4 *filing.*

5
6 DATED: June 21, 2007

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2 *this Stipulation and [Proposed] Order to Extend Time and Establish Briefing Schedule. In*
3 *compliance with General Order 45, X.B., I hereby attest that Lee H. Rubin has concurred in this*
4 *filing.*

5
6 DATED: June 21, 2007

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* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____


THE HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE

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STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME AND
ESTABLISH BRIEFING SCHEDULE - Master File No. C-06-03468-SI

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 21, 2007.

s/ Benny C. Goodman III
BENNY C. GOODMAN III

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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